Strategies and Reminders
To Help Ensure Compliance with the Standards

Using the Correct Definition for Commercial Interest

**Check** (forms, policies, emails, etc.) to make sure you are using the correct definition of a commercial interest to identify relevant relationships.

- **Correct definition:** Any entity producing, marketing, re-selling, or distributing health care goods or services consumed by, or used on, patients.
- **Outdated/Incorrect definition:** Any proprietary entity producing health care goods or services, with the exemption of non-profit or government organizations and non-health care related companies.

Identifying Relevant Financial Relationships

- **Obtain** information in advance of an activity so you have time to resolve any conflicts before the activity. Disclosure to learners, by itself, or actions taken only after the activity, are not acceptable mechanisms.
- **Maintain a list and collect information** about all relationships that are relevant to the content from the prior 12 months, including those of the partner or spouse from all those who control content:
  - Plan
  - Review (e.g. CME Committee members)
  - Author
  - Edit
  - Teach, or
  - Evaluate each of your CME activities (e.g. CME Committee members)

Resolving Conflicts of Interest

- **Keep records** to show that you consistently identified and resolved relevant financial relationships for each person who reported a relevant financial relationship.
- If a course director or planner has a conflict of interest, **consider** having them recuse themselves from participating in planning the part of the activity related to the conflict, and identify a non-conflicted co-director who will assume that responsibility.
- **Confirm** that anyone in control of content is not an employee or owner of a company that is a commercial interest; an employee/owner may only participate in restricted roles as outlined on ACCME’s website — content of the CME activity is not related to the business lines or products of their employer; content of the CME activity is limited to basic science research (e.g., pre-clinical research, drug discovery) or the processes/methodologies of research, themselves unrelated to a specific disease or compound/drug (in these circumstances, the accredited provider must be able to demonstrate that it has implemented processes to ensure employees of ACCME-defined commercial interests have no control of CME activity content that is related to clinical applications of the research/discovery or clinical recommendations concerning the business lines or products of their employer); or can participate as technicians in accredited CME activities that teach the safe and proper use of medical devices (in this circumstance, the accredited provider must demonstrate that it implements processes to ensure that employees of ACCME-defined commercial interests have no control of CME activity content that is related to clinical recommendations concerning the business lines or products of their employer).

Disclosing to Learners

**Keep records** to show that you consistently disclosed for all who control content.

- Disclose to learners any **relevant financial relationship(s)**, to include the following information — name of the individual; name of the commercial interest(s), and nature of the relationship the person has with each commercial interest.
- For individuals with **no relevant financial relationship(s)**, the learners must be informed that no relevant financial relationship(s) exist.